

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC., and AMAZON DATA  
SERVICES, INC.,

Plaintiffs,

v.

Case No. 1:20 Civ. 484

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA WPC  
LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CARLETON NELSON;  
CASEY KIRSCHNER; ALLCORE  
DEVELOPMENT LLC; FINBRIT HOLDINGS  
LLC; CHESHIRE VENTURES LLC; JOHN  
DOES 1-20,

Defendants.

**MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL AND  
MEMORANDUM IN SUPPORT THEREOF BY DEFENDANTS  
CARLETON NELSON AND CHESHIRE VENTURES LLC**

In accordance with the Protective Order in this case, Dkt. 55, Defendants Carleton Nelson and Cheshire Ventures LLC respectfully seek leave to file under seal portions of the memorandum of law in support of their Motion To Dismiss Plaintiffs' Second Amended Complaint, as well as the entirety of Exhibits A and B to the Declaration of Caleb Hayes-Deats in support of that motion, dated October 9, 2020. Those filings contain information that Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. (collectively, "Amazon") have designated as "Confidential" or "Highly Confidential—Attorneys' Eyes Only" under the Protective Order.

Without waiving any objections they may have or relief they may seek under the

Protective Order, Nelson and Cheshire Ventures take no position at present as to Amazon's designation of the information at issue as "Confidential" or "Highly Confidential—Attorneys' Eyes Only," but file this motion to comply with the Protective Order and Local Civil Rule 5(C).

Under Local Civil Rule 5, Amazon "must file a response to [this] motion complying with [the] requirements" of Local Civil Rule 5(C)(2), (3), and (4), justifying the sealing of the above-referenced materials, and supplying a proposed order.

Dated: October 9, 2020

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 9, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. On October 9, 2020, I will further send the document and a notification of such filing (NEF) to the following parties by e-mail:

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Dated: October 9, 2020

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